

**UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK**

SHAWN CAREY, MSS CAPITAL, LLC,  
HUNTS ROAD, LLC, ION1 LLC,  
BRICKELL CAPITAL SOLO 401K TRUST,  
KAILEY LEWIS, EDWARD REINLE,  
EMANUEL VALADAKIS and ZITAH  
MCMILLAN-WARD, individually and on  
behalf of all others similarly situated,

Plaintiffs,

v.

MICHAEL MOE, PETER B. RITZ, LZG  
INTERNATIONAL, INC., ROGER  
HAMILTON, and GENIUS GROUP  
LIMITED,

Defendants.

Case No. 1:24-cv-07551

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GENIUS GROUP LIMITED,

Petitioner,

v.

LZG INTERNATIONAL, INC., MICHAEL  
THOMAS MOE and PETER RITZ,

Respondents.

VSTOCK TRANSFER, LLC,

Nominal Respondent.

LZG INTERNATIONAL, INC.'S  
SHAREHOLDERS,

Intervenor.

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Case No. 1:24-cv-08464

**PLAINTIFFS' NOTICE OF RULE 42(A)(2) MOTION TO CONSOLIDATE**

**PLEASE TAKE NOTICE** that, on a date and time as may be set by the Court, Plaintiffs will respectfully move this Court, pursuant to Federal Rule of Civil Procedure 42(a)(2), for entry of an Order consolidating the above-captioned actions. This motion is based on the accompanying Memorandum of Law in support hereof, the pleadings and other filings herein, and such other written and oral argument as may be permitted by the Court.

For the foregoing reasons, Plaintiffs respectfully request that the Court (1) consolidate the above-captioned actions; and (2) grant such other and further relief as the Court may deem just and proper.

Dated: December 6, 2024

Respectfully Submitted,

**AXS LAW GROUP, PLLC**  
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By: /s/ Jeffrey W. Gutchess  
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*Counsel for the Plaintiffs*

**CERTIFICATE OF SERVICE**

I HEREBY CERTIFY that, on December 6, 2024, a true and correct copy of the foregoing was served on all counsel of record via CM/ECF.

By: /s/ Jeffrey W. Gutchess  
Jeffrey W. Gutchess